## Exhibit A\_Declaration of Donald J. Trump

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRUMP YOUR COMPETITION, INC., : 15 Misc. 00400

Plaintiff-Applicant, : In re Proceeding No. 91217618

: (Pending before the United States

v. : Trademark Trial and Appeal Board)

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DONALD J. TRUMP,

:

Defendant-Opposer.

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## **DECLARATION OF DONALD J. TRUMP**

DONALD J. TRUMP declares and says:

- 1. I am the founder, President and Chairman of The Trump Organization ("Trump Org.") and the Defendant-Opposer in this proceeding.
- 2. I submit this declaration (i) in opposition to the motion by Plaintiff-Applicant Trump Your Competition, Inc. ("TYC") to compel my trial testimony in a related proceeding (the "Proceeding") pending before the United States Trademark Trial and Appeal Board (the "TTAB"), pursuant to Fed. R. Civ. P. 45(d), and (ii) in support of my motion for a protective order pursuant to Fed. R. Civ. P. 26(c) precluding TYC from deposing me in the TTAB Proceeding.
- 3. Trump Org. is a multi-billion -dollar business enterprise that serves as a principal holding company for my business ventures, including the operation of numerous residential real estate properties, hotels, resorts, golf courses, wineries and

entertainment ventures which are identified, marketed and sold under the "Trump" name and brand.

- 4. As part of the regular operation of its business, Trump Org. controls, manages and licenses more than 500 trademarks containing or incorporating the "Trump" name in connection with a wide variety of products and services in jurisdictions all over the world (the "Trump Trademarks").
- 5. Given the breadth and scope of the business and the number of Trump Trademarks, I have delegated full responsibility and authority for the supervision of the Trump Trademarks to Alan Garten, Executive Vice President and General Counsel of Trump Org.
- 6. In such capacity, Mr. Garten oversees both the day-to-day and long term management, enforcement and overall strategy associated with the filing and prosecution of the Trump Trademarks and is the person most knowledgeable concerning the Trump Trademarks and all matters relating thereto.
- 7. In addition to Mr. Garten, my son, Eric Trump, Executive Vice President of Development and Acquisitions of Trump Org., is also knowledgeable concerning the management, licensing and use of the Trump Trademarks.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of January, 2016 New York, New York

